REMARKS/ARGUMENTS

Claims 1-26 remain in this application, all of which stand rejected.

1. Objection to Claim 13 Under 37 CFR 1.75(a)

Claim 13 stands objected to because the phrase "said displaying", in line 1, lacks antecedent basis.

An appropriate correction has been made, without the introduction of new matter, and claim 13 is now believed to be allowable.

2. Rejection of Claims 1-12, 22 and 23 Under 35 USC 102(b)

Claims 1-12, 22 and 23 stand rejected under 35 USC 102(b) as being anticipated by Loui et al. (US 7,039,239 B2; hereinafter "Loui").

With respect to claims 1-10, the Examiner generally asserts that all of the limitations of these claims are taught by Loui. However, the Examiner does not *specifically indicate* where Loui teaches any of the elements of these claims.

With respect to claim 1, applicant asserts that Loui's teachings are largely irrelevant to applicant's claimed invention. That is, Loui's teachings are directed to a method of *classifying image regions* using labeled training data and supervised training. In contrast, applicant's claim 1 is directed to a computer readable medium having instructions that indicate the probabilities of *training data structures belonging to identified classes.* More specifically, Loui's method uses labeled training data to develop a class probability map that assigns each pixel in an image a "probability of association with every semantic class" (see, col. 10, line 59 - col. 11, line 4). Applicant's claim 1, on the other hand, calculates "a respective probability indicative of the respective training data structure belonging to its identified class", and generates "a scatter plot, using said plurality of training data structures, that

visually indicates probabilities of said training data structures belonging to identified classes."

Claim 1 is believed to be allowable for at least the above reasons. Claims 2-10 are believed to be allowable, at least, because they depend from claim 1. Claims 11, 12, 22 and 23 are believed to be allowable, at least, for reasons similar to why claim 1 is believed to be allowable.

3. Rejection of Claims 13-21 and 24-26 Under 35 USC 103(a)

Claims 13-21 and 24-26 stand rejected under 35 USC 103(a) as being anticipated by Loui et al. (US 7,039,239 B2; hereinafter "Loui") in view of Donoho (IEEE Computer Graphics and Applications, July 1988, pp. 51-58).

With respect to claims 13-21 and 24-26, the Examiner asserts that Loui teaches the elements of base claims 11 and 22, and Donoho teaches the additional limitations set forth in claims 13-21 and 24-26. However, without addressing the merits of Donoho, applicants assert that claims 13-21 and 24-26 are allowable, at least, because 1) they respectively depend from claims 11 and 22, and 2) Donoho does not teach that which is missing from Loui (as discussed in Section 2 of these Remarks/Arguments, *supra*).

4. Conclusion

In light of the amendments and remarks provided herein, applicant respectfully requests the issuance of a Notice of Allowance.

Respectfully submitted,
HOLLAND & HART, LLP

By:

Gregory W. Osterloth
Reg. No. 36,232
Tel: (303) 295-8205